

**FILED**

AO 106A (08/18) Application for a Warrant by Telephone or Other Reliable Electronic Means

UNITED STATES DISTRICT COURT  
LAS CRUCES, NEW MEXICO

## UNITED STATES DISTRICT COURT FEB - 6 2025

for the  
District of New MexicoMITCHELL R. ELFERS  
CLERK OF COURT

In the Matter of the Search of  
*(Briefly describe the property to be searched  
 or identify the person by name and address)*  
 2200 Holiday Cir., Trailer 317,  
 Las Cruces, New Mexico 88005  
 (more fully described below)

Case No.

25-234 MR

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A, attached and fully incorporated herein.

located in the State and District of New Mexico, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, attached and fully incorporated herein.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section  
 8 U.S.C. 1324

Offense Description  
 Transportation and Harboring of Illegal Aliens, and Conspiracy To Do the Same

The application is based on these facts:

See Attachment C, attached and fully incorporated herein.

☒ Continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days *(give exact ending date if more than 30 days)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

*Adrian Parra*  
 Applicant's signature

Adrian Parra, Border Patrol Agent  
 Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
 Telephone \_\_\_\_\_ *(specify reliable electronic means)*.

Date: 02/06/2025

*Gregory J. Fouratt*  
 Judge's signature

City and state: Las Cruces, New Mexico

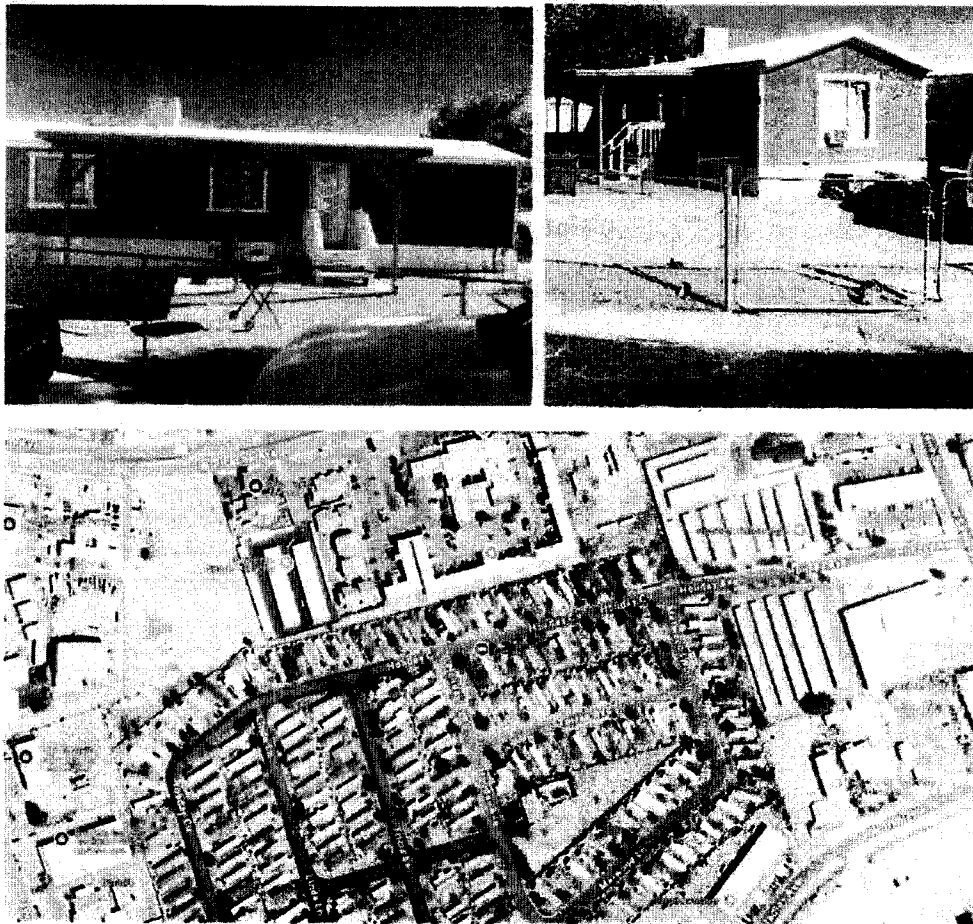
Gregory J. Fouratt, United States Magistrate Judge  
 Printed name and title

**ATTACHMENT A**

**DESCRIPTION OF PROPERTY TO BE SEARCHED**

The residence at 2200 Holiday Cir., Trailer 317, Las Cruces, New Mexico 88005, which is near the intersection of Tricia Ln. and Holiday Cir., in Las Cruces, New Mexico. The residence is the corner trailer of this intersection, which is west of Seventeenth St. and south of Picacho Ave. The single-family, trailer home is blue in color, with white trim and a white shed on the ground on the west side of the trailer. The front door faces west, towards Picacho Ave. and is accessible by wooden stairs. The residence is sitting on a dirt plot adjacent a paved road within the trailer lot. This is the only trailer on its plot, but there are trailers to the north, south, east, and west of the property. The picture below was taken on February 6, 2025, at approximately 2:00 p.m. when agents arrived on scene.

To include all outbuildings, structures, and vehicles on the property.



**2200 Holiday Cir., Trailer 317, Las Cruces, NM 88005**

**ATTACHMENT B**

**DESCRIPTION OF PROPERTY TO BE SEIZED**

Evidence, fruits, and instrumentalities of the violations of 8 USC § 1324, transporting and harboring illegal aliens, and conspiracy to do the same, including the following:

1. Illegal aliens.
2. Valid and false travel immigration documents including passports, visas, immigration forms and other related documents.
3. Any and all computers, cellular telephones, personal tablets, laptop computers, personal electronic devices, communication devices, two-way radios, pagers, and scanners.
4. Any and all diaries, address books, names, and notes of ledgers containing lists of names and addresses of individuals who may have been in contact with those individuals responsible for the smuggling of illegal aliens, and illegal drugs.
5. Business records, financial records, ledgers, transactions, account books, computerized records, and notes showing code names or nicknames; identifying information reflecting the transactions for illegal aliens, and to those individuals responsible for said violations, amounts of money paid, or owed.
6. Any and all appointment calendars for all years.
7. Any and all illegal alien or sponsor lists, harborer or transporter lists, or any notes containing the individual names, telephone numbers of, and any corresponding records of accounts receivable, money paid, or cash received to pay for the smuggling of illegal aliens, and illegal drugs.
8. Telephone and address books or notes, which indicate a criminal association between known and unknown persons.
9. Any financial institution, Western Union, Money Gram, or similar service records reflecting a business transaction with those involved in the smuggling, harboring, or transportation of illegal aliens.
10. Any and all passports, accounts and records in fictitious names, false identification, money orders, cashier's checks relating to cash transactions and records indicating the existence of stash houses used in alien smuggling.
11. Airline tickets or other documents relating to the travel of the illegal aliens from their country of origin to the United States or travel within the United States.

12. Any amount of currency, financial instruments, and other items of value typically received as the proceeds of illegal alien smuggling.
13. Indicia of ownership or occupancy for 2200 Holiday Cir., Trailer 317, Las Cruces, New Mexico 88005.
14. Records, envelopes, accounts, correspondence or notes, in any form, to or from 2200 Holiday Cir., Trailer 317, Las Cruces, New Mexico 88005.
15. Any safe deposit box keys, storage keys or records pertaining to safe deposit boxes or storage areas where additional fruits of the crime may be located.

The terms "records" and "information" include any and all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any electrical, electronic, optical, or magnetic form (such as any information on an electronic or magnetic or optical storage device, including but not limited to hard disks, thumb drives/USB drivers, ZIP/JAZ disks, compact disks, digital versatile disks, magneto-optical discs, backup tapes, printer buffers, smart cards, memory calculators, pagers, personal digital assistants, as well as printouts or readouts from any said device); any handmade form (such as writing, drawing); any mechanical form (such as printing, copying, videotaping, still or motion digital imaging, or typing); and any photographic form (such as microfilm, microfiche, prints, slides, negatives, motion pictures, photocopies).

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

IN THE MATTER OF THE APPLICATION )  
OF THE UNITED STATES OF AMERICA )  
FOR AN ORDER AUTHORIZING THE ) CASE NO. \_\_\_\_\_  
SEARCH OF: 2200 Holiday Cir., Trailer 317, )  
Las Cruces, New Mexico 88005 )

**AFFIDAVIT IN SUPPORT OF ORDER AUTHORIZING**  
**SEARCH WARRANT**

I, Adrian Parra, being duly sworn, deposes and states the following:

**INTRODUCTION**

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the premises known as 2200 Holiday Cir., Trailer 317, Las Cruces, New Mexico 88005, hereinafter the "Subject Premises," further described in Attachment A, for purposes of searching for and seizing the items described in Attachment B.
2. I am a United States Border Patrol Agent (BPA) assigned to the Las Cruces Border Patrol Station in Las Cruces, NM. As a Border Patrol Agent, I have been trained and employed as a federal law enforcement officer with statutory arrest authority charged with conducting criminal investigations of alleged violations of federal criminal statutes, including Title 8, Title 18, and Title 21 of the United States Code. I have conducted investigations related to immigration laws violations since 2002 and have specialized in investigations involving human smuggling. During my twenty-two-year law enforcement career, I have received specialized training on the subjects of human smuggling and have been personally involved in

investigations concerning the subject matter.

3. During my career as a Border Patrol Agent, I have served as a Task Force Agent (TFA) for the Drug Enforcement Administration (DEA) which focused on drug and immigration violations. I have participated in numerous aspects of alien smuggling and drug trafficking investigations including conducting physical surveillance, execution of search and arrest warrants, undercover operations, analysis of phone and financial records, and the arrest of alien and drug smugglers. I have interviewed numerous defendants and other witnesses having extensive knowledge of the *modi operandi* of major alien smuggling organizations (ASO) and Drug Trafficking Organizations (DTO). I have also spoken on numerous occasions with other experienced alien smuggling investigators concerning the methods and practices of such violators. Through these investigations, training, experience, and conversations with other law enforcement personnel, I have become familiar with the methods alien smugglers use to take hostage, transport, conceal, harbor, or to shield from detection illegal aliens. I have also become familiar with the similar methods drug smugglers use to conduct illicit activity.
4. I know, based upon my training and experience, as well as information relayed to me during the course of my official duties, that members of ASOs routinely use wire, electronic, and application communication facilities, including cellular telephones, WhatsApp, Messenger, Facebook, other electronic means, to communicate operational directives and information concerning the conduct of the organization's illegal activities to other organization members. I also know that individuals who deal in alien and drug smuggling commonly maintain contact information, such as telephone numbers, for their business associates in their electronic devices, including cellphones.

5. During the course of my duties, I have found that ASOs often utilize ledgers to keep track of how many aliens they smuggle, how much each alien is being charged, where they are being taken, and other similar information. I have also interviewed alien smugglers who worked for different ASOs, yet they utilized the same stash houses and transport vehicles. As a result, alien smugglers need to keep track of which ASOs the aliens are associated with by utilizing ledgers.
6. I know, based upon my training and experience, as well as information relayed to me during the course of my official duties, that ASOs and the stash houses that they maintain often have money and evidence of money transfers for the fees that they have charged to harbor and transport illegal aliens, as well as travel documents and identifications, both real and false, relating to the illegal aliens that the ASO is harboring and transporting. I have found that ASOs also utilize firearms to maintain order in a stash house and at times to intimidate illegal aliens, so they won't attempt to escape or cause a potential threat to any caretakers.

#### **BACKGROUND**

7. The statements in this affidavit are based on information I have gained through investigation as well as my own experience, training, and background as a Border Patrol Agent, and information provided by other law enforcement agents who I believe to be reliable. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause for a search of the Premises. I make this Affidavit based on personal knowledge and on the basis of information received from other law enforcement officers and/or agents.

8. As will be shown below, there is probable cause to believe that evidence, fruits, and instrumentalities of violations of 8 USC § 1324 are currently located at the Premises. I am submitting this affidavit in support of a search warrant authorizing a search of the Premises, which is more particularly described in Attachment A. I am requesting authority to search the entire Premises, including the residential dwelling, outbuildings, vehicles on the premises, and any location within these locations where the items specified in Attachment B may be found, and to seize all items listed in Attachment B as instrumentalities, fruits, and evidence of crime.

**PROBABLE CAUSE**

9. On February 6, 2025, Homeland Security Investigations (HSI) special agents observed approximately seven vehicles parked outside of 2200 Holiday Avenue, Trailer 317 in Las Cruces, New Mexico (the Subject Premises). Agents had previously received information that individuals at the Subject Premises were involved in human smuggling activities.
10. One of the vehicles parked at the Subject Premises on February 6, 2025, was identified as a white Ford F-150 bearing New Mexico license plate BYKN26, registered to Eyny Santiago-Cervantes of 2200 Holiday Avenue, Trailer 317. Records showed that Santiago-Cervantes is an undocumented alien previously arrested by United States Border Patrol (USBP) in September 2023 in relation to a failed human smuggling attempt.
11. Agents approached a male and female subject standing in the front yard for a consensual encounter, at which time the female went inside the residence and closed the door. The male subject declined to speak with agents. Agents took a photograph of the male subject and departed the residence.
12. Agents sent the photograph to USBP agents, who recognized the male in the photo as

undocumented alien Evin Villeda-Ramirez, who had previously been identified as a suspected co-conspirator during a failed human smuggling attempt in May 2024.

13. Agents with USBP and HSI returned to Trailer 317 on February 6, 2025, and observed Villeda-Ramirez and a female standing in the backyard of the residence. Agents called out to the subjects from the street in front of the residence and observed both subjects flee. Villeda-Ramirez fled into the residence, while the female fled eastbound, where she was apprehended in the neighboring property. During an immigration inspection by USBP agents, she was identified as undocumented alien Marlin Villeda-Ramirez.
14. Agents approached the back door of Trailer 317, which was rapidly opened by a female subject, who called out to a dog in the backyard. Agents ordered the female to show her hands, at which time she slammed the door closed. The occupants of Trailer 317 refused to open the doors for agents who were knocking, and agents subsequently established a perimeter around the residence.
15. Based on my training and experience, it is common for individuals involved in alien smuggling to rent space from other people to use as stash houses. Several attempts to make contact with the people inside were made, but agents were unable to make contact with anyone. Border Patrol Agents and Homeland Security agents have been on scene since they arrived at approximately 02:15 p.m. and have not seen anyone else exit the Subject Premises.

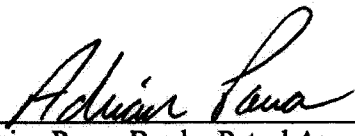
#### **CONCLUSION**

16. Based on the aforementioned factual information, I respectfully submit that there is probable cause to believe that evidence, fruits and instrumentalities used in committing violations of 8 USC § 1324, transporting and harboring illegal aliens, and conspiracy to do the same, which

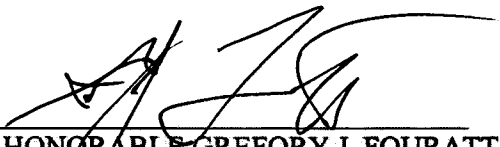
are listed specifically in Attachment B, incorporated herein by reference, are presently located at the Subject Premises.

Accordingly, I respectfully request that this Court issue a warrant authorizing a search of the Subject Premises, which is described with particularity in Attachment A, for the items described in Attachment B.

Respectfully submitted,

  
Adrian Parra, Border Patrol Agent  
United States Border Patrol

Subscribed and sworn to before me by telephone  
on this 6th day of February 2025:

  
THE HONORABLE GREFORY J. FOURATT  
UNITED STATES MAGISTRATE JUDGE